

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DECLARATION OF ROBERT C. GILL IN SUPPORT
OF DEFENDANTS' MOTION IN LIMINE TO EXCLUDE EVIDENCE
OF PLAINTIFF'S LOST REVENUE, LOST PROFITS, AND LOST PROFIT DAMAGES**

1. I am an attorney at Saul, Ewing, Arnstein & Lehr LLP, counsel for Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"). I was admitted *pro hac vice* in this matter on October 27, 2017.

2. Attached as **Exhibit A** is a true and correct copy of certain excerpts of Plaintiff's Sixth Supplemental Objections and Responses to Defendant Castle Hill Studio LLC's First Set of Interrogatories (Nos. 1-13), dated August 3, 2018..

3. Attached as **Exhibit B** is a true and correct copy of certain excerpts of the deposition of James Starr.

4. Attached as **Exhibit C** is a true and correct copy of certain excerpts of the FRCP 30(b)(6) Deposition of VGT (Vice President of Financial Planning and Analysis, Don Kovach).

5. Attached as **Exhibit D** is a true and correct copy of certain excerpts of the September 6, 2018 Motion to Compel Discovery Hearing Transcript.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 12, 2018 in Washington, District of Columbia.

/s/ Robert C. Gill
Robert C. Gill

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of October, 2018, I caused an unredacted copy of the foregoing Declaration to be served on the following counsel for Plaintiff who have consented to email service, via email:

Graydon Dean Luthey, Jr., OBA 5568
GABLE GOTWALS
1100 ONEOK Plaza
100 West Fifth Street
Tulsa, OK 74103-4217
(918) 595-4821
(918) 595-4990 facsimile
dluthey@gablelaw.com
Counsel for Video Gaming Technologies

Gary M. Rubman
Peter Swanson
Michael Sawyer
Rebecca B. Dalton
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, D.C. 20001-4956
(202) 662-6000
(202) 778-5465 facsimile
grubman@cov.com
pswanson@cov.com
msawyer@cov.com
rdalton@cov.com
Counsel for Video Gaming Technologies

Neil K. Roman
COVINGTON & BURLING LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
(212) 841-1221
(212) 841-1010 facsimile
nroman@cov.com
Counsel for Video Gaming Technologies

/s/ Robert C. Gill
Robert C. Gill